

REMARKS

The indication that claims 3-12 include patentable subject matter is acknowledged with thanks.

Claims 1-2 were rejected as anticipated by MILES et al. 2001/0038138. Claim 1 has been amended and reconsideration and withdrawal of the rejection are respectfully requested.

Amended claim 1 includes, among other features, first and second guard rings and first connections that extend into the substrate, such as shown in Figure 10A. By contrast, MILES et al. disclose a guard ring (the Official Action points to element 6 in Figure 3) and a connection (presumably 18, 19 in Figure 3) between the first and second guard rings (6 and 8) that do not extend into the substrate (1). Accordingly, amended claim 1 avoids the rejection under §102.

By way of further explanation, MILES et al. disclose that the metal guard ring 6 and silicon guard ring 8 are arranged vertically at intervals and are connected by metal connection plate 18 which does not surround the circuit region. These rings cannot prevent water from entering the circuit region because the rings are connected vertically at only a part of metal connection plate 18.

New claims 13-20 have been added and their allowance is respectfully requested. Claims 13-16 are allowable because MILES et al. disclose that the guard rings and connections are in the semiconductor, not in the insulating layer as claimed. Claims

17-20 are allowable because MILES et al. disclose that the guard rings overlap in plan view.

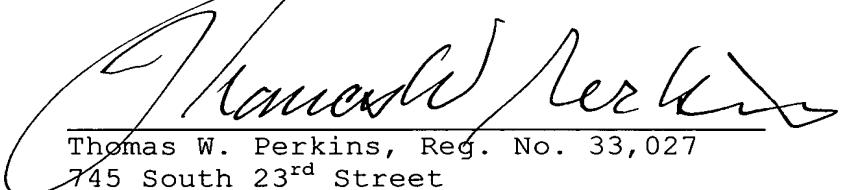
Consideration of all species is respectfully requested.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON



Thomas W. Perkins, Reg. No. 33,027  
745 South 23<sup>rd</sup> Street  
Arlington, VA 22202  
Telephone (703) 521-2297  
Telefax (703) 685-0573  
(703) 979-4709

TWP/lk